

N60508.AR.000284  
NAS WHITING FIELD  
5090.3a

LETTER REGARDING FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION  
COMMENTS ON SITE 2 RECORD OF DECISION AMENDMENT NAS WHITING FIELD FL  
9/5/2008  
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Charlie Crist  
Governor

Jeff Kottkamp  
Lt. Governor

Michael W. Sole  
Secretary

September 5, 2008

Mr. Benjamin T. "Tread" Kissam, P.G.  
Department of the Navy  
Naval Facilities Engineering Command Southeast  
Building 903  
NAS Jacksonville  
Jacksonville, Florida 32212-0030

**RE: Record of Decision Amendment for Operable Unit 2 – Site 2, Northwest Open Disposal Area, Rev. 1, Naval Air Station Whiting Field, Milton, Florida (Tetra Tech NUS, Inc., April 4, 2008)**

Dear Mr. Kissam:

I have reviewed the above document dated April 4, 2008 (received on April 4, 2008). A Record of Decision (ROD) Amendment is needed for Site 2 in order to modify the ROD signed in September 1999 (HLA, 1999). In the September 1999 ROD, a Land Use Controls (LUCs) remedy was selected to provide protection for human health and the environment against the lone constituent of concern (COC), arsenic. However, subsequent soil analysis at NAS Whiting Field indicates the presence of arsenic at elevated concentrations not only at Site 2 but also facility wide. A review of the historical site activities at Site 2 does not support an anthropogenic source for arsenic at the site. Therefore, arsenic has been dropped as a contaminant of concern (COC) for surface soil at Site 2 and the selected remedy is no longer necessary. I have the following comments pertaining to this document:


- 1. Section 1.3, Assessment of the Site, Page 1-3:** After the last sentence of this paragraph please add a sentence or two which discusses the arsenic background study and its findings. Following this/these sentence(s) it may be appropriate to state that "It was determined that the arsenic at the site, which is the basis of the previous remedial decision, is naturally occurring, and not the result of a CERCLA release."
- 2. Section 1.4, Description of the Selected Remedy, Page 1-3:** The first sentence should be revised as follows: "The Navy and USEPA, with FDEP concurrence, selected LUCs as the remedy for Site 2 as documented in the September 1999 ROD (HLA, 1999)."
- 3. Section 2.1, Site Name, Location, and Description, Page 2-1:** The first and second sentences should read: "Site 2, which is an old borrow pit, is a 12-acre parcel located along the northwestern facility boundary near the North Airfield. Currently, the site is dominated by a surface depression. The elevation of the lowest point at the bottom of this depression is approximately 20 feet below the surrounding land surface." Also, please add the word "the" between "from" and "perimeter" in the second to the last sentence in this paragraph.
- 4. Table 2-1, Page 2-4:** This table should list the report date(s) that the subsequent soil sampling and analytical results were captured in. The arsenic background study should also be listed as well.



5. **Section 2.4, Scope and Role of Remedial Action Selected For Site 2, Page 2-5:** Please add the word "The" between "of" and "Remedial" in the header. The eighth sentence should read: "However, as discussed previously, subsequent soil analysis at NAS Whiting Field indicates that the presence of arsenic at elevated concentrations at Site 2 is consistent with background concentrations found elsewhere at the installation."
6. **Section 2.5, Site Characteristics, Page 2-5:** The second sentence should read: "Currently, the site is a surface depression. At its lowest point, the bottom elevation is approximately 20 feet below the surrounding land surface." Also, please add the word "the" between "from" and "perimeter" in the middle part of this paragraph.
7. **Section 2.5.1, Nature and Extent of Contamination, Page 2-6:** The second sentence should read: "Concentrations of inorganics detected in soil samples at Site 2 were compared to the concentrations of inorganics in the background samples to determine if the inorganic levels detected in the Site 2 samples were the result of site related activities or if they were due to naturally occurring conditions."
8. **Section 2.5.1, Nature and Extent of Contamination, Page 2-6:** After the first sentence in the second paragraph please add a sentence or two describing the reason for the new determination that arsenic is naturally occurring at Whiting Field. Also, the last sentence in this paragraph should read: "Based on these findings, the LUC remedy at Site 2 is being removed in this ROD Amendment."
9. **Section 2.5.1.1, Surface Soil, Page 2-6:** EPA's comment for this section is appropriate which states: "As a result of the removal of arsenic as a site-related contaminant, no COCs were identified in surface soil at Site 2." This additional sentence should also be placed in the **Subsurface Soil Section** (substitute "subsurface" for "surface").
10. **Section 2.5.2, Ecological Habitat, Page 2-7:** Are risks to ecological habitats supposed to be discussed in this section? If so, then please see the Proposed Plan for additions to this section.
11. **Section 2.11, Documentation of Significant Changes, Page 2-13:** Please provide a short summary of the significant changes that have occurred at Site 2 to prompt this ROD Amendment.

Thank you for the opportunity to review this document. If you require additional clarification or other assistance please feel free to contact me at 850/245-8999.

Sincerely,



John Winters, P.G.  
Remedial Project Manager

JJC 

for ESN 